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17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,
20
21 Plaintiff,

22 v.

23 COLUMBUS MANUFACTURING, INC.,
24 Defendant.

Civil Action No. 3:12-cv-00471-EMC

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27 **JOINT STIPULATION TO TERMINATE**
28 **CONSENT DECREE**

COME NOW the Parties to this action, the United States of America, and Columbus
Manufacturing, Inc. (CMI) and file this Joint Stipulation To Terminate the Consent Decree

1 entered by this Court on March 14, 2012. Pursuant to the Consent Decree at Section XVII,
2 Paragraph 75, CMI submitted a Request for Termination of the Consent Decree on January 5,
3 2015. Pursuant to the Consent Decree at Section XVII, Paragraph 76, the United States and CMI
4 have conferred and have determined that CMI has completed all the requirements of this Consent
5 Decree. Thus, the Parties are submitting for the Court's approval this joint stipulation
6 terminating the Decree pursuant to Paragraph 76 of the Consent Decree.
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8 The parties submit to the Court that CMI has completed the requirements of Section V
9 (Injunctive Relief) of the Decree, has maintained satisfactory compliance with the
10 Consent Decree for a period of six months following completion of the third-party audits, has
11 paid the civil penalties required of Section IV of the Decree, and has otherwise satisfactorily
12 complied with the requirements for termination of the Consent Decree. The parties request entry
13 of the attached proposed Order approving this Joint Stipulation To Terminate Consent Decree.
14 The parties will be executing separate signature pages for this Joint Stipulation.
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THE UNDERSIGNED PARTIES enter into this Joint Stipulation To Terminate Consent Decree in the Matter of United States of America v. Columbus Manufacturing, Inc., Civil Action No. 3:12-cv-00471-EMC (N.D. Cal.).

FOR PLAINTIFF UNITED STATES OF AMERICA:

/s/Cheryl A. Luke
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FOR DEFENDANT COLUMBUS MANUFACTURING, INC.

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**[PROPOSED] ORDER TERMINATING
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CONSENT DECREE**

29 The Court having read the Joint Stipulation to Terminate the Consent Decree entered by
the Court on March 14, 2012, and the Court being advised that the Defendant has met all

obligations under the Decree, it is hereby

ORDERED:

That the Consent Decree in this matter is now TERMINATED, and there being no further outstanding issues between the parties, the litigation is hereby DISMISSED with prejudice.

DONE AND ORDERED this 13th day of February, 2015.

